

Comment Response Louisiana Regional Haze SIP

1. **LDEQ's source-specific BART analyses for Sulfur Dioxide are flawed.**
 - a. **Rodemacher 2:** The LDEQ and CLECO have agreed in that the installation of the enhanced DSI as a control constitutes BART. The parties have entered into an Administrative Order of Consent (AOC) providing that upon final approval of this SIP submittal, the facility will install as expeditiously as practicable, not to exceed 1 year, the enhanced DSI to comply with BART.
 - b. **Big Cajun II, Unit I:** The body of the document currently reflects the results of the CALPUFF screening indicating that the units have "screened-out". An AOC restricting emission limits to current rates has been executed and is being submitted as part of this final document.
2. **Louisiana's proposed reliance on CSAPR as a BART alternative is unlawful and the rule itself is fundamentally flawed.**
 - a. On December 30, 2011, the EPA proposed to find that the trading programs in the Transport Rule would achieve greater reasonable progress towards the national visibility goal than would source-specific BART in states in which the Transport Rule applies. Based on this finding, the EPA also revised the Regional Haze Rule to allow states to substitute participating in the trading programs under the Transport Rule for source-specific BART. (77 FR 33642)
 - b. Commenter's opinion as to whether or not a federal rule is flawed is not an indicator as to the state's obligation to meet the requirements set forth in said rule.
3. **Louisiana's proposed SIP revision fails to satisfy the Regional Haze Program's Reasonable Progress Requirements.**
 - a. Louisiana provided EPA with the first phase reasonable progress goal in its June 13, 2008 submittal; a follow-up to this submittal will be made as required in the newly promulgated and updated regional haze rule.
4. **Louisiana should not rely on CAMx modeling for BART determinations.**
 - a. The LDEQ did not rely on the CAMx modeling, but rather relied on CALPUFF modeling as is required by the Clean Air Act and the BART rules. The LDEQ has included all CAMx modeling as a weight-of-evidence argument for those facilities that have provided such modeling to be included in the SIP.
5. **Entergy's five-factor BART analysis is flawed.**
 - a. The LDEQ did not rely on the CAMx modeling, but rather relied on CALPUFF modeling as is required by the Clean Air Act and the BART rules. The LDEQ has included all CAMx modeling as a weight-of-evidence argument for those facilities that have provided such modeling to be included in the SIP.
6. **LDEQ's BART analysis for Nelson is fundamentally flawed due to lack of specific, enforceable emission limits.**
 - a. The LDEQ has reviewed the CALPUFF modeling that was submitted and has based its decision on the 5-factor analysis as well as emission reductions that have occurred at the facility.
7. **The Lafayette Utilities System Louis "Doc" Bonin Generating Station must submit the required analysis or another enforceable mechanism to show that plant is not operational.**
 - a. The necessary documents have been submitted and are contained in Appendix E, Municipal Facilities.

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8. **Entergy Michoud Generating Station must submit documentation proving that the facility cannot start up again without obtaining a new permit.**
 - a. The necessary documents have been submitted and are contained in Appendix D, Entergy Louisiana LLC.
9. **Entergy Nine Mile Point Generating Station: The state should establish enforceable emission limits or elect to set a fuel oil sulfur content standard consistent with a BART level of control.**
 - a. The state elected to set a fuel oil sulfur content standard. The parties have executed an AOC which is contained in Appendix D, Entergy Louisiana LLC.
10. **Entergy Little Gypsy: The state should establish enforceable emission limits or elect to set a fuel oil sulfur content standard consistent with a BART level of control.**
 - a. The state elected to set a fuel oil sulfur content standard. The parties have executed an AOC which is contained in Appendix D, Entergy Louisiana LLC.
11. **Entergy Willow Glen: The proposed SIP states that before fuel oil firing is allowed at the facility, a revised BART determination must be promulgated.**
 - a. An AOC has been executed and will be included in the SIP. Upon approval of the SIP, this document will become federally enforceable.
12. **Entergy Waterford: The state should establish enforceable emission limits or elect to set a fuel oil sulfur content standard consistent with a BART level of control.**
 - a. The state elected to set a fuel oil sulfur content standard. The parties have executed an AOC which is contained in Appendix D, Entergy Louisiana LLC.
13. **Entergy RS Nelson and Waterford Facilities: EPA posed a number of comments related to the Sargent and Lundy cost analyses.**
 - a. See Appendix A, Public Notice and Comment for a copy of the answers to those specific questions that was provided by Entergy.
14. **Commenter does not recommend using CAMx for BART determinations:**
 - a. The LDEQ did not rely on the CAMx modeling, but rather relied on CALPUFF modeling as is required by the Clean Air Act and the BART rules. The LDEQ has included all CAMx modeling as a weight-of-evidence argument for those facilities that have provided such modeling to be included in the SIP.
15. **Commenter stated that primary and supporting information was incomplete:**
 - a. All information involved in decision making process is in body of SIP or respective appendices. Modeling files can be made available upon request.
16. **Commenter recommended that respondent use Sargent and Lundy models to project correct control cost.**
 - a. In the April 18, 2016 submittal to Guy Donaldson, Region 6 EPA, Table 5-3. Summary of Cost Effectiveness for Unit 2, Footnote 3 states that this was based on a cost evaluation prepared by Sargent and Lundy.
17. **Commenter believes that conclusions for Big Cajun Unit II are inconsistent and suspect, and recommended that the conclusion be revisited.**
 - a. The section on Big Cajun II has been edited. The units screened out and are therefore not BART eligible.
18. **Commenter recommended that LDEQ work closely with Region 6 to evaluate BART controls and final determinations.**
 - a. LDEQ has worked very closely with EPA on this SIP and believes that the document presented is a culmination of the work from both parties.